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16 *Counsel for the Official Committee*
17 *of Unsecured Creditors*

18 **UNITED STATES DISTRICT COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA**
20 **SAN FRANCISCO DIVISION**

21 In re:

22 PG&E CORPORATION

23 - and -

24 PACIFIC GAS AND ELECTRIC
25 COMPANY,

26 Debtors.

Civil Case No. 19-05257 (JD)

Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**STATEMENT AND RESERVATION OF
RIGHTS OF OFFICIAL COMMITTEE OF
UNSECURED CREDITORS REGARDING
DEBTORS' MOTION PURSUANT TO 11
U.S.C. §§ 105(A) AND 502(C) TO ESTABLISH
ESTIMATED AMOUNT OF FIRE VICTIM
CLAIMS FOR ALL PURPOSES OF THE
CHAPTER 11 CASES**

Date: May 21, 2020

Time: 10:00 a.m.

Place: Courtroom 11

Judge: Hon. James Donato

1 The Official Committee of Unsecured Creditors (the “Creditors’ Committee”) appointed
 2 in the above-captioned chapter 11 cases hereby submits this statement and reservation of rights
 3 in connection with the *Debtors’ Motion Pursuant to 11 U.S.C. §§ 105(a) and 502(c) to Establish*
 4 *Estimated Amount of Fire Victim Claims for All Purposes of the Chapter 11 Cases* [Docket No.
 5 286] (the “Motion”).¹

6 **STATEMENT AND RESERVATION OF RIGHTS**

7 The Creditors’ Committee submits this statement and reservation of rights in light of the
 8 TCC’s “Response” filed yesterday, April 2, 2020 [Docket No. 295], to the Debtors’ Motion. The
 9 Response goes beyond the relief requested in the Motion and affirmatively seeks to fashion its *own*
 10 relief – including that the Court issue an order that not only estimates Fire Victim Claims at \$13.5
 11 billion, but *further directs the form of currency in which the \$13.5 billion must be paid*,
 12 according to the framework of an RSA that the TCC alleges has been breached. The TCC also
 13 appears to ask the Court to issue this alternative order without regard to the conditions precedent
 14 in the RSA, including whether the TCC’s class votes to approve the Plan or whether the Plan is
 15 confirmed by June 30, 2020.

16 The Creditors’ Committee reserves its rights to respond to the TCC’s Response on or
 17 before the April 10, 2020 deadline for replies in connection with the Debtors’ Motion.

18
 19 Dated: April 3, 2020

20 **MILBANK LLP**

21 /s/ Gregory A. Bray
 22 DENNIS F. DUNNE
 23 SAMUEL A. KHALIL
 24 GREGORY A. BRAY
 25 THOMAS R. KRELLER

26
 27 *Counsel for the Official Committee of*
 28 *Unsecured Creditors*

1 Capitalized terms not defined herein shall have the meanings given them in the *Debtors’ and*
 2 *Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated March 16, 2020*
 [Bankr. Docket No. 6320] (the “Plan”).